

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

JOAO MONTEIRO,)	
)	C.A. No. 1:21-cv-00046-MSM-LDA
Plaintiff,)	
)	
v.)	
)	
SUSAN CORMIER, TREVOR LEFEBVRE,)	
DANIEL MULLEN, TINA GONCALVES,)	
CITY OF PAWTUCKET, and TAMARA)	
WONG,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**PARTIES' JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

Under Federal Rule of Civil Procedure 26(c), the parties jointly request that the Court enter the Stipulated and HIPAA qualified Protective Order, attached hereto as Exhibit A.

Supporting this Motion, the parties state the following:

1. The Stipulated Protective Order is necessary to protect confidential and private information that will be disclosed in the course of discovery in this action.
2. Under Fed. R. Civ. P. 26(c), the parties ask that the Court enter the attached Stipulated Protective Order to govern the exchange and use of such information, subject to resolving the disputes between Plaintiff and Defendants as described in paragraph 3.
3. The parties agree to the contents of the protective order.

WHEREFORE, the parties respectfully request that the Court enter the Stipulated Protective Order, attached hereto as Exhibit A.

Dated: September 27, 2021

RESPECTFULLY SUBMITTED,

Attorneys for Plaintiff, Joao Monteiro

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CERTIFICATE OF SERVICE

I, Mark Loevy-Reyes, an attorney, hereby certify that on September 27, 2021, I filed the foregoing PARTIES' JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Mark Loevy-Reyes
One of Plaintiff's Attorneys